



**Janeen Sanders**  
**MCIWorldCom Carrier Management/OSS**  
**205 N. Michigan Ave.**  
**Suite 3700**  
**Chicago, IL**

March 2, 2000

Mr. Salvatore Fioretti  
SBC/Ameritech, Inc.  
350 North Orleans  
Chicago, Ill.

**Re: Illinois Performance Measure Filing**

Dear Mr. Fioretti:

This letter serves to respond to your draft for the March 6<sup>th</sup> filing to the Illinois Commerce Commission regarding Ameritech's implementation of Performance Measures. MCIWorldCom wishes to submit the following changes to some statements and additional commentary to others. MCIWorldCom deems these edits as necessary to more accurately reflect the outcome of the collaborative meetings.

**Section of document:** *Implementation Schedule and Listing of Texas Performance Measures*  
*[Implementation Schedule paragraph, page 10]*

**Quote:**

*As of March 1, 2000, Ameritech has implemented forty-one (41) of the one hundred twenty eight (128) performance measures listed above.*

The list of measures immediately above this sentence of the document consists of 121 measures. Including the INLP and EASE measures, which were eliminated, still does not result in a total of 128 measures. Please alter this sentence to reflect 121 measures or clarify the figure of 128 measures.

**Section of document:** *Parity vs. Benchmark*  
*['Collocation' paragraph, page 13]*

**Quote:**

*On the following Collocation measures, Ameritech and the CLECs agreed to implement a parity comparison to AIT affiliates on an interim basis. These measures will be reviewed in June at which time a more permanent standard will be set.*

*107 Percentage Missed Collocation Due Dates*

*108 Average Delay Days for SWBT Missed Due Dates*

*109 Percent of Requests Processed Within the Tariffed Timelines*

The agreement reached at the 2/14 and 2/15 collaborative meetings was for an interim benchmark comparison until further data could be provided and the decision reviewed again in June. Please alter the language to reflect this agreement.

**Section of document:** *Parity vs. Benchmark*  
[#2 under description of categories, page 12]

**Quote:**

*Eight (8) measures that are designated as diagnostic in the Texas business rules. Diagnostic measures are intended to report results that support (or not) findings reported in other measures. Since these measurements are duplicative, they typically are not subject to remedies. There is no reason to make a retail comparison to a diagnostic measure as it is intended to validate the performance established in other measures.*

Pursuant to Staff's advice (Mr. McClerren) that the report should also include areas of disagreement, MCIWorldCom believes it important to note here that the CLECs did not agree that these measures should be excluded from remedy plans. Please include a sentence stating CLECs opposition to the categorization of these diagnostic measures.

**Section of document:** *Parity vs. Benchmark*  
[sections referring to benchmark comparisons, pages 12 and 13]

**Quote:** *After thorough discussion over three separate days the CLEC participants and Ameritech agreed that the following Texas measurements had no retail analog and should remain as benchmark measures...*

*The CLEC participants agreed with Ameritech that the following three diagnostic measures should remain benchmark measures:*

It should be noted in these sections also, that CLECs' agreement of benchmark comparisons did not necessarily indicate agreement with the benchmarks set. Benchmark standards are to be reconsidered in the second phase of the collaborative sessions.

**Section of document:** *Collaborative*  
[section describing objective of merger agreement, page 6]

**Quote:** *Other issues such as modifications and additions to the Texas measurement plan, modifications to the statistical methodology used in Texas, modifications to the Texas remedy plan, and other miscellaneous issues would be discussed in phase two of the collaborative process which would extend beyond the initial sixty day interval.*

MCIWorldCom contends that CLECs need not be required to have metrics included in the contracts for receiving reports and remedies and recommends that the paragraph be modified to state this note. One suggestion is to insert 'whether inclusion of metrics in contracts should be a prerequisite for receiving reports and remedies' after '...modifications to the Texas remedy plan...'

**Section of document:** *Parity vs. Benchmark*  
[#1 under description of categories, page 12]

**Quote:**

*Nine (9) measures which are "Parity by Design". These performance measures were designed to have the wholesale results reported in aggregate with the retail data. Therefore, a comparison to retail is not reasonable since the retail results are intermixed with the wholesale results.*

Categorization of the measures as 'parity by design' should be verified by audit or third party test. The paragraph should be modified to reflect that this categorization has not been verified.

The modification of the draft with the above recommendations would serve as an acceptable account of the collaborative effort.

If you have questions regarding MCIWorldCom's comments, please feel free to contact me.

Sincerely,  
Janeen Sanders  
MCIWorldCom Carrier Management/OSS  
773-756-6223